19	WAYMO LLC,
20	Plaintiff,
21	V.
22	UBER TECHNOLOGIES, INC., OTTOMOTTO LLC; OTTO TRUCKING LLC,
23	Defendants.

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UNDER SEAL EXHIBITS TO THEIR MOTION TO COMPEL PRODUCTION **OF DOCUMENTS** 

Hon. Jacqueline Scott Corley Trial Date: October 10, 2017

## I, Maxwell V. Pritt, declare as follows:

- 1. I am counsel at the law firm of Boies Schiller Flexner LLP representing

  Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, "Uber") in this matter. I

  am a member in good standing of the Bar of the State of California. I make this declaration based

  upon matters within my own personal knowledge and if called as a witness, I could and would

  competently testify to the matters set forth herein. I make this declaration in support of Uber's

  Administrative Motion to File Under Seal Exhibits to Their Motion to Compel Production of

  Documents.
- 2. I have reviewed the following exhibits and confirmed only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	<b>Designating Party</b>
Letter Brief to Compel	Highlighted Portions	Plaintiff
Production of Documents		
Exhibit 5 to the Pritt	Entire Document	Plaintiff
Declaration		
Exhibit 6 to the Pritt	Entire Document	Plaintiff
Declaration		

- 3. The highlighted portions of the Letter Brief to Compel Production of Documents and the entirety of Exhibits 5 and 6 to the Pritt Declaration contain information that I understand has been designated by Waymo as "Highly Confidential Attorneys' Eyes Only" pursuant to the Protective Order.
- 4. Uber's request to seal is narrowly tailored to the specific exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of July, 2017 at Oakland, California.

Dated: July 26, 2017 BOIES SCHILLER FLEXNER LLP

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

## **ATTESTATION OF E-FILED SIGNATURE**

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this document. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has concurred in this filing.

Dated: July 26, 2017

/s/ Karen L Dunn

Karen L. Dunn